Exhibit B

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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

December 4, 2019

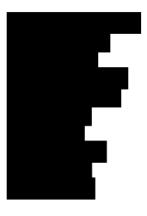
By Email

Jennifer L. Achilles Eric Sussman Reed Smith LLP 599 Lexington Ave, 22nd Floor New York, New York 10022 Jonathan Streeter
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1095 Avenue of the Americas
New York, NY 10036

Re: United States v. Telemaque Lavidas, 19 Cr. 716 (DLC)

Dear Counsel:

We write in response to your request that the Government provide a bill of particulars identifying, among other things, co-conspirators of defendant Telemaque Lavidas. While we do not agree that a bill of particulars is warranted, this letter provides a voluntary disclosure that the following individuals are co-conspirators of the defendant with respect to the charged conspiracies:



The Government reserves the right to supplement this list prior to trial. The contents of this letter are designated as "sensitive disclosure material" pursuant to the protective order in this case.

Very truly yours,

GEOFFREY S. BERMAN United States Attorney

by: /s/
Richard Cooper / Daniel Tracer
Assistant United States Attorneys
(212) 637-1027 / 2329